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**U.S.** Department of Justice

*United States Attorney* Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

June 16, 2020

**BY ECF** 

The Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

An arraignment and initial conference is scheduled for July 1, 2020. The Court excludes time under the Speedy Trial Act through that See 18 U.S.C. § 3161(h)(7)(A). date.

SO ORDERED.

NAOMI REICE BUCHWALD United States v. Rayquan Turner, 20 Cr. 302 (NRB) UNITED STATES DISTRICT JUDGE

Dated: June 17, 2020

RE:

Dear Judge Buchwald:

The Government writes to respectfully request that an arraignment and initial conference in the above-referenced case be scheduled. On June 15, 2020, a three-count indictment was returned charging the defendant with (1) possessing a firearm after having knowingly been convicted of a felony, in violation of Title 18, United States Code, Section 922(g), (2) possessing with intent to distribute mixtures and substances containing heroin and fentanyl, in violation of Title 21, United States Code, Section 841(a)(1), and 841(b)(1)(C), and (3) using, carrying and possessing a firearm in furtherance of a drug trafficking crime, in violation of Title 18, United States Code, Section 924(c) and 2. The defendant was charged with these offenses by complaint on January 10, 2020 and has been detained at the Metropolitan Correctional Center since his arrest on January 15, 2020.

In light of the current health crisis caused by COVID-19, and after conferring with the Court, the Government understands that the arraignment and initial conference will occur telephonically and that July 1, 2020 is a date convenient to the Court. To that end, the parties respectfully request that the arraignment and initial conference be scheduled for July 1, 2020.

The Government further requests that the Court exclude time from today until the scheduled date of the conference. The exclusion of time will allow defense counsel to review discovery (which the Government expects to produce in advance of the conference) and to determine whether any motions will be filed. Accordingly, the Government submits that the ends of justice served by the exclusion of time outweigh the best interests of the public and the defendant in a speedy trial, pursuant to 18 U.S.C. § 3161(h)(7)(A). The defendant consents to this request.

Respectfully submitted,

GEOFFREY S. BERMAN United States Attorney

By:

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cc: Defense Counsel (via ECF)